CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION

CALL BACK CAPABILITIES FOR "NON SUBSCRIBED-TO" PHONES

Ex Parte Presentation

WT Docket No. 00-80

CC Docket No. 94-102

The Concerns Raised Regarding Non Subscribed-To Phones Have Long Been Recognized by the Commission

- In its E-911 First Report and Order in 1996, the Commission mandated the forwarding of *ALL* wireless E-911 calls.

- In the same Order, the Commission recognized certain disadvantages with requiring the forwarding all calls, including:
  - "It is not currently possible for carriers to provide reliable call back numbers for all wireless 911 calls."

- In its First Reconsideration Order, the Commission asked carriers to report regularly on the status of the call back problem.

Safety—
Your most
important call
The Wireless Industry
Reminds You To Use Your
Phone Safely When Driving

The Technical Problems That Exist Are a Result of Carriers Complying with the Commission's Rules

- Call validation, authentication, and registration are key to wireless networks' ability to identify callers.

- To complete a wireless call, a carrier must validate each user to establish the service features associated with the caller as well as to generate a billing record and prevent fraud.

- In order to forward *all* E-911 calls, wireless networks either bypass or disregard the call validation process for 911 calls.

Safety—
Your most
important call

The Wireless Industry
Reminds You To Use Your
Phone Safely When Driving

No Technical Solution Currently Exists For Non Subscribed-To Phones

- In response to a request from the Commission in its First Reconsideration Order, the wireless industry established the "Wireless E 911 Implementation Ad Hoc Group ("WEIAD")."

- WEIAD, consisting of representatives from the wireless industry, public safety, and consumer groups, has determined that "the technical impediments . . . have not yet been overcome."

The Solution Proposed By the Ad Hoc Alliance is Not Feasible

- The Temporary Local Directory Number ("TLDN") can not be used for E-911 call back.
  - TLDN is used in a roaming environment;
  - TLDN is used solely for call delivery;
  - TLDN is valid for only 20 seconds.
- In the case of non subscribed-to phones, the TLDN would be mapped to the phone number programmed into the handset, which in a number-conservation environment may already have been given to a new subscriber.

Even if Established, No Technical Solution Would Address the E-911 Call Back Problem

- The concerns raised by the Public Safety entities regarding "donated wireless phones" have expanded to include new "E-911 Only" phones.

- "E-911 Only" handsets are not designed to be activated and are not being marketed through carriers' distribution channels.

- "E-911 Only" phones are physically incapable of receiving any calls.

- No technical solution will address these phones.

Safety—
Your most
important call
The Wireless Industry
Reminds You To Use Your
Phone Safely When Driving

Education and Training is the Key to Solving the Call Back Problem

- Because a technical solution is not currently available and would not solve the call back problem, the Commission must consider an alternative approach.

- The Commission should advise the public of the safety benefits associated with the use of service-activated handsets to call 911.

- The Wireless Foundation can serve as a model to organizations that donate wireless phones.
  - Call to Protect
  - Communities on Phone Patrol
  - ClassLink

Safety—
Your most
important call
The Wireless Industry
Reminds You To Use Your
Phone Safely When Driving

CONCLUSION

- No technical solution currently exists to address non subscribed-to phones.

- Even if established, no technical solution would address the E-911 call back problem.

- The Commission should advise the public of the safety benefits associated with the use of service-activated handsets to call 911.